

MEMORANDUM

RE: Ex Parte Communications in Connection with  
Docket No. EERE-2016-BT-STD-0022  
Energy Conservation Standards for Uninterruptible Power Supplies: Pre-Publication  
Energy Conservations Standards Final Rule

To: [expartecommunications@hq.doe.gov](mailto:expartecommunications@hq.doe.gov)

From: Alex Boesenberg, Senior Manager of Regulatory Affairs  
National Electrical Manufacturers Association

Enc: Spreadsheet "NEMA UPS Secondary Features and Power Consumption\_ v2.xlsx"

Date: July 28, 2017

This memorandum is in follow up to our letter of July 5, 2017 which summarized the discussion of our ex parte meeting of June 29, 2017. During the aforementioned meeting, NEMA Power Electronics Section members volunteered to supply DOE with additional data with respect to power drain and other related considerations for secondary features and their impact on energy efficiency testing results. This additional data is provided in the accompanying spreadsheet. This data demonstrates the associated power considerations of certain secondary features of a UPS product and our position that even when turned off these features can impact energy efficiency test results. It is our hope that the DOE will consider this information as further supporting justification to reopen the rulemaking, as requested in our letter to Secretary Perry of March 9, 2017.

As stated at the June 29<sup>th</sup> meeting, it is the industry view that consumer-demanded secondary features do impact product performance during energy efficiency testing and, despite attempts to accommodate this in the revised Test Procedures, these impacts were not adequately understood or assessed in the rulemaking analyses to date. We hope that the information in the spreadsheet will assist the Department in more fully assessing the impacts of the proposed standards on product performance and redesign challenges associated with these consumer demanded features.

NEMA again thanks the DOE for this opportunity to comment on the pre-publication UPS standards prior to their finalization.

If you have any questions on these comments or the spreadsheet, please contact me at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,

A handwritten signature in blue ink that reads "Alex Boesenberg". The signature is fluid and cursive, with the first name "Alex" and last name "Boesenberg" clearly distinguishable.

Alex Boesenberg  
Senior Manager, Regulatory Affairs  
National Electrical Manufacturers Association